



February 11, 2000 9265 00 FEB 15 AIO 25

U.S. Department of Agriculture
FSIS Hearing Clerk
Docket No. 98-045N
300 12th Street, S. W.
Room 102 Cotton Annex
Washington, D.C. 20250-3700

Food and Drug Administration
Dockets Management Branch (HFA-305)
Docket No. 97N-0074
5630 Fishers Lane
Room 1061
Rockville, MD 20852

Re: President's Council on Food Safety Strategic Plan

Dear Sir or Madam:

The Corn Refiners Association, Inc., (CRA) appreciates the opportunity to provide these comments on the President's Council on Food Safety Strategic Plan. The CRA and its member companies support the public's right-to-know that their food is safe and continually work to reduce the prevalence of foodborne hazards.

The CRA is the national trade association representing the corn wet milling industry. Members of the Association produce starches, sweeteners, alcohol, feed ingredients and vegetable oil using the corn wet milling process. A list of Association members is attached.

Overarching Goal and Overall Framework

The efforts of the President's Council on Food Safety are commendable and should be continued. However, more diligence should be applied so that scientific, not political, considerations drive future food safety initiatives. The United States has a very safe food supply from "farm and sea to table." Food producers have universally implemented modern food safety management programs such as the Hazard Analysis Critical Control Point program and Good Manufacturing Practices.

Unfortunately, most foodborne illness in the U.S. is caused by the mishandling of food in the ever growing food service establishments and by home preparation of food. Therefore, research and education should be more prominent throughout the strategic plan. Primary attention should be targeted at educating food handlers. Educational activity must be widespread and continuous for behavior modification.

Federal resources should focus on the greatest risk. National resources, such as state and local officials and other food safety organizations, can help fill any gaps that might exist in Federal programs. A database should be developed with Internet accessibility to provide a vehicle for public understanding of available resources and for information sharing among stakeholders.

97N-0074

C227

Strategic Plan Implementation/Recommended Organizational Changes

As with any strategic plan, the goals and objectives must be clearly defined, have specific measures to quantify results, timelines for action, funding sources and accountability for accomplishment. The agencies must undertake a cost/benefit analysis to fully understand the risk/cost balance of strategic plan implementation. Finally, an improved infrastructure and better coordination should be the first priority. A thorough assessment of the value of a single food safety agency should be conducted.

Sound Science and Risk Assessment Goal

Food safety regulations and policy decisions must be based on peer reviewed, reproducible research. A mechanism must be instituted to ensure that good science is practiced in the decision making process. Risk must be defined as being made up of both hazard and exposure. Industries that produce low risk, highly refined products should not undergo the same levels of regulation and oversight as those industries that produce "fresh" foods.

We caution against regulating emergencies. The regulations that result may end up erroneous and are difficult to remove. Last year's HACCP reassessment for *Listeria monocytogenes* is an example of an initiative not based on sound science. It was a reactive response rather than proactive policy. This reassessment was ordered in response to a listeriosis outbreak caused by one producer of refrigerated cooked ready-to-eat meat products. This was only the second outbreak of foodborne listeriosis to be documented in the U.S.; the first such outbreak having occurred in 1985 (in a soft cheese product). In the intervening 14 years, meat and dairy industries revolutionized their approach to sanitation to eliminate the sources of environmental contamination that could lead to foodborne listeriosis.

It is almost always the case that when an outbreak of foodborne illness is caused by a processed food, there has been a food safety failure on the part of a single food producer, as happened in both the 1985 and 1999 outbreaks of listeriosis. These outbreaks were not caused by the entire industry segment. Therefore, the costs associated with the HACCP reassessment were not warranted for the benefit received.

Risk Management Goal

As stated under the Overarching Goal, food producers have successfully implemented numerous quality and food safety programs to ensure "clean" products leave their facilities. Increased regulatory attention toward the food processing industry will have little impact on reducing the number of foodborne illnesses.

Following the farm to table policy, monitoring must begin at the farms since this segment of food suppliers has been ignored in the past. Legislation should be pursued to receive the authority for farm oversight. As stated earlier, much foodborne illness in the U.S. is caused by the mishandling of food in food service operations or in the home preparation of food. Comparatively little foodborne illness is caused by failures by food processors. Therefore, food handling is another area on which to focus education and training since this portion of the service industry continues to grow and more people buy already prepared food in grocery stores and eat out in restaurants.

The Federal government should strive to harmonize performance standards among the states and international bodies when possible. However, these standards must be science-based, achievable and appropriate in order to maintain the credibility of government and industry in the eyes of the consumer. We recommend both inter- and intra-agency validation of performance standards. We strongly support Objective 6, encouraging risk-based, voluntary approaches for improving food safety.

In Objective 4, inspections must focus on the highest risk food safety threats identified by Objective 4 under the Science and Risk Assessment Goal. The focus should be on particular products rather than on specific industries. Training for enforcement officials must be consistent for carrying out inspections properly and fairly. There should be a single policy, if not agency, for food inspection, separate from research and marketing.

We support Objective 7 of promoting the development and transfer of new technologies and approaches to risk management. Although proven safe, the food additive status of irradiation is a statutory barrier to more rapid progress in reducing foodborne illness. This statute should be repealed since labeling may deter consumers from buying these safe products.

USDA's zero tolerance standard for *E. Coli* 0157:H7 in raw ground beef is also a barrier. It is not sound science to have a zero tolerance standard for a microbial pathogen in a raw food material. Similarly, pathogen performance standards in raw foods are an unnecessary expenditure of resources by both the agency and the industry. The raw food processor has an obligation to use anti-microbial interventions to reduce the level of pathogens in raw materials. However, validation and verification of these interventions can be accomplished more practically by simpler microbiological tests, e.g., total viable counts, than by pathogen performance standards.

Pesticides are an area where the data accumulated to date clearly shows this is neither a public health nor regulatory compliance issue. Additional expenditure of resources in this area has questionable benefit to the Overarching Goal previously stated. Other chemical contaminants (i.e., dioxin, polyaromatic hydrocarbons, heavy metals, etc.) should be included in improved monitoring if the situation warrants or as new scientific information is made available. Proper risk assessment must be part of the discussion of additional expenditures in this area.

Risk Communication Goal

This goal can be fulfilled by placing a major emphasis on educational activities, especially within the schools and through the media. The dietary guidelines may be used as a vehicle to educate the public in food safety and/or a program like FDA's "Fight Back" expanded. Additional regulatory activities will do little to reduce foodborne illnesses. There must be some component of consumer responsibility, whereby the consumer is held responsible for the proper preparation of food.

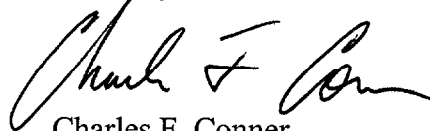
Responding to food emergencies should be of utmost importance, however information security must be maintained. Messages on food safety challenges should be targeted and reviewed prior to release to the general public. Information should be communicated clearly, timely and accurately.

U.S. Department of Agriculture/
Food and Drug Administration
February 11, 2000
Page 4

The agencies should become more proactive internationally in promoting a positive image of the American food supply. Together, we are doing many things very well to provide a safe and wholesome food supply. Such promotion would allay unfounded consumer fears and would assist the American farmer through increased exports of foodstuffs. The safety of our meat supply and our genetically-enhanced crops are two examples where the public health/regulatory agencies should be more proactive in promoting the numerous benefits of these products.

Thank you again for the opportunity to comment on the President's Council on Food Safety Strategic Plan. If you have any questions, please call Jennifer Snyder of my staff.

Sincerely,

A handwritten signature in black ink, appearing to read "Charles F. Conner". The signature is fluid and cursive, with a large initial "C" and "F".

Charles F. Conner
President

Attachment

MEMBER COMPANIES

Corn Refiners Association, Inc.
1701 Pennsylvania Avenue, N. W.
Washington, D. C. 20006

ADM Corn Processing
(A division of Archer Daniels
Midland Company)
P. O. Box 1470
Decatur, Illinois 62525
tel: 217-424-5200/fax: 217-424-5839

Cargill, Incorporated
P. O. Box 9300
Minneapolis, Minnesota 55440
tel: 612-742-7575/fax: 612-742-7580

Cerestar USA, Inc.
1100 Indianapolis Boulevard
Hammond, Indiana 46320-1094
tel: 219-659-2000/fax: 219-473-6600

Corn Products International, Inc.
6500 South Archer Avenue
Bedford Park, Illinois 60501-1933
tel: 708-563-2400/fax: 708-563-6852

Minnesota Corn Processors
901 North Highway 59
Marshall, Minnesota 56258
tel: 507-537-2676/fax: 507-532-2906

National Starch and Chemical Company
P. O. Box 6500
Bridgewater, New Jersey 08807
tel: 908-685-5000/fax: 908-685-5005

Penford Products Co.
(A company of Penford Corporation)
P. O. Box 428
Cedar Rapids, Iowa 52406
tel: 319-398-3700/fax: 319-398-3797

Roquette America, Inc.
1417 Exchange Street
Keokuk, Iowa 52632
tel: 319-524-5757/fax: 319-526-2466

A. E. Staley Manufacturing Company
(A subsidiary of Tate & Lyle, PLC)
P. O. Box 151
Decatur, Illinois 62525
tel: 217-423-4411/fax: 217-421-2216

Plants:
Cedar Rapids, Iowa
Decatur, Illinois
Clinton, Iowa
Montezuma, New York

Plants:
Blair, Nebraska
Cedar Rapids, Iowa
Eddyville, Iowa
Dayton, Ohio
Memphis, Tennessee
Wahpeton, North Dakota

Plants:
Hammond, Indiana
Decatur, Alabama
Dimmitt, Texas

Plants:
Argo, Illinois
Stockton, California
Winston-Salem, North Carolina

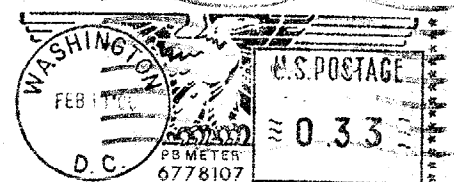
Plants:
Marshall, Minnesota
Columbus, Nebraska

Plants:
Indianapolis, Indiana
North Kansas City, Missouri

Plant:
Cedar Rapids, Iowa

Plant:
Keokuk, Iowa

Plants:
Decatur, Illinois
Lafayette, Indiana (2)
Loudon, Tennessee



Food and Drug Administration
Dockets Management Branch (HFA-305)
Docket No. 97N-0074
5630 Fishers Lanes
Room 1061
Rockville, MD 20852

20857-0001

